



ATTORNEYS AT LAW
nmllplaw.com

Ira S. Nesenoff
Andrew T. Miltenberg

Stuart Bernstein
Tara J. Davis
Gabrielle M. Vinci

Barbara H. Trapasso
Adrienne D. Levy
Regina M. Federico
Ben Goldstein
Amy Zamir
Kristen Mohr
Helen Setton
Jordan Tuchman

Kara L. Gorycki
Susan E. Stark
Julie A. Sacks
*Senior Litigation
Counsel*

Marybeth Sydor
Title IX Consultant

October 11, 2023

BY ECF

Honorable P. Kevin Castel
United States District Court
Southern District of New York
Daniel Patrick Moynihan U.S. Courthouse
500 Pearl Street, Courtroom 11D
New York, NY 10007

**Re: *Fairstein v. Netflix, Inc.* Case No. 20-cv-08042
Plaintiff's Request to Extend Deadline**

Dear Judge Castel:

The undersigned represents Plaintiff Linda Fairstein ("Plaintiff") in the above-referenced action. In accordance with Part 1.C of Your Honor's Individual Practices, we write to request a two-week extension of the February 2, 2024 submission deadline set forth in the Pre-Trial Scheduling Order. (Doc No. 218). Should the extension be granted, Plaintiff's responses to Defendants' in limine motions and the parties' proposed Joint Pre-Trial Order, including stipulations of fact, will be due on February 16, 2024.

Pursuant to the Pre-Trial Scheduling Order, Plaintiff currently has 14 days to respond to Defendants' motions in limine, object to Defendants' trial exhibits and any designations of deposition testimony and respond to Defendants' proposed stipulations of fact. In contrast, Defendants have 35 days to respond to Plaintiff's submissions. As Your Honor is aware, the parties have previously engaged in substantial motion practice in this case. We anticipate that this will continue with Defendants' in limine motions. Plaintiff is represented by a small firm, and as such is limited in the number of lawyers available to adequately respond to Defendants' submissions within the allotted 14-day period.

Plaintiff has not previously requested an extension of this deadline.

363 Seventh Avenue | 5th Floor | New York, NY | 10001 | T: 212.736.4500

101 Federal Street | 19th Floor | Boston, MA | 02110 | T: 617.209.2188

4 Palo Alto Square | 3000 El Camino Real | Suite 200 | Palo Alto, CA | 94306 | T: 650.209.7400



Counsel for the parties have conferred about this matter and Defendants have no objection to Plaintiff's request.

Respectfully Submitted,

By: /s/ Kara L. Gorycki
Kara L. Gorycki (KG 3519)
Andrew T. Miltenberg (AM 7006)
NESENOFF & MILTENBERG, LLP
363 Seventh Avenue, 5th Floor
New York, New York 10001
Phone: (212) 736-4500
kgorycki@nmlplaw.com
amiltenberg@nmlplaw.com

cc:

All Counsel of Record (via ECF)

363 Seventh Avenue | 5th Floor | New York, NY | 10001 | T: 212.736.4500

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